
Memo

To: Kevin Gauthier

From: Chris Reuther

Date: August 7, 2018

Subject: PPE for P-18-019

Based on a request to the personal protective equipment (PPE) use regard to the PMN of product number P-18-0169, I would continue to assess the hazards to employees the same as manner as other products that we currently manufacture. Further referencing industrial hygiene air monitoring that we had completed in 2017 for respiratory exposure to employees.

At this point in time all employees are required to wear level D PPE for handling any chemicals which consists of FR rated pants, long sleeve shirt, safety glasses, rated safety toe work boots, hard hat and appropriate gloves. For handling containers it is imperative to wear the disposable black nitrile gloves by Onyx where incidental contact is likely. If direct contact would be required for any of the chemicals that are required to produce this product it is required that the employee wear the Ansell green nitrile gloves.

The air monitoring that was conducted encompassed many of the chemicals required to make this product or chemicals with similar properties. The conclusion of this air monitoring with regard to respiratory protection is that when working over a vessel with an open manway the employee is required to wear an air purifying respirator (APR) with a GMA P-100 cartridge. We are currently employing a qualitative fit test method with half face APRs providing a 10x assigned protection factor which is more than adequate for this application based on the industrial hygiene air monitoring.

Reference:

Ansel Nitrile: <http://www.ansell.com/en-US/Products/solvex-37-175>

Onyx Nitrile: <http://www.ansell.com/en-US/Products/microflex-onyx-n64>

Respirator & Cartridge: <http://us.msasafety.com/>